

Ai's ANTI-CORRUPTION CODE

1. For the purposes of this Code and Ai's Anti-Corruption Policy, the word "Corruption" includes bribery, extortion, fraud, deception, collusion, cartels, and abuse of power, embezzlement, trading in influence, money-laundering and similar criminal activity and the word "Corrupt" shall have a corresponding meaning.
2. Corruption causes poverty and suffering, inhibits economic growth, is damaging to business, and may result in criminal and civil liability and penalties for organisations and individuals.
3. Ai Claims Solutions plc (and its subsidiaries) ("Ai") prohibits its officers and employees, and those related companies which it controls, from engaging in any form of Corruption in relation to Ai's business and affairs.
4. Ai will use all reasonable endeavours to conduct its business and affairs so as to ensure that it does not engage in or facilitate any form of Corruption.
5. In order to minimise the opportunity for Corruption, Ai does not make any political or charitable donation, or provide any gift or hospitality to any person or organisation which (in aggregate) are in excess of £10,000 per annum without the prior approval by two independent directors. It also prohibits the receipt by Ai or any of its officers or employees of any donation, gift or hospitality which (in aggregate) is in excess of £10,000 per annum without, again, the prior approval by two independent directors. All donations, gifts and hospitality provided or received by Ai or its officers or employees must be recorded in a gifts register which is routinely inspected.
6. A facilitation payment is a payment made to encourage a person to carry out his or her duty. Even though facilitation payments are in many cases obtained by way of extortion, they are nevertheless a form of Corruption and the making or receiving of a facilitation payment is a criminal offence in many jurisdictions including the UK. Ai prohibits the making of any facilitation payment, save in circumstances where the personal safety of any person is endangered.

Employees should report any facilitation requests to HR to ensure effective monitoring in this area.

7. Anti-corruption action by Ai is not sufficient in itself to reduce Corruption to any significant extent. There must, in addition, be concerted and collaborative action by all stakeholders. Ai, therefore, supports efforts and works with other stakeholders to reduce Corruption in the sectors it operates in.
8. Ai has adopted a corporate anti-corruption programme to enable it to comply with this Code. Ai will properly implement this programme and review it on an annual basis to ensure that it is operating effectively. This programme will be available on both Ai's website and the internal Ai intranet in due course.